

JAN 31 2018

David J. Bradley, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA

v.

CYNTHIA LUNA RODRIGUEZ

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§
§

Criminal No. M-16-1156

NOTICE OF PLEA AGREEMENT

COMES NOW the United States of America, hereinafter referred to as "the Government," by and through its United States Attorney for the Southern District of Texas and its Assistant United States Attorney assigned to this matter, and would respectfully show the Court that the Government and the Defendant have entered into the following plea agreement:

1. Defendant agrees:

- a. to plead guilty to Counts Two, Five and Seven of the Indictment;
- b. in exchange for the benefits extended to the Defendant by the Government in this plea agreement (as listed below in Section 2 of this plea agreement), the Defendant agrees, pursuant to 18 U.S.C. § 3663(a)(3), to make full restitution to the following named victims:

Name of Victim	Restitution Amount
B. J.	\$26,087.00
O. H.	\$27,064.47
C. H.	\$340,657.49
PlainsCapital Bank	\$711,088.08

The Defendant agrees that 18 U.S.C. § 3663(a)(3) gives rise to this plea agreement. The Defendant understands that the Court, pursuant to 18 U.S.C. § 3663(a)(1)(A), may order the Defendant to make restitution beyond what is stated in this plea agreement and that the Court is not bound by this plea agreement; and

- c. a personal money judgment against her and in favor of the United States for an amount to be determined by the Court.

2. The Government will recommend:

- a. that the offense level decrease by 2 levels pursuant to U.S.S.G. § 3E1.1(a) if the defendant clearly demonstrates acceptance of responsibility; and
- b. that the remaining counts of the indictment be dismissed at the time of sentencing.

If the Defendant is not a citizen of the United States of America, a plea of guilty may result in removal from the United States, denial of citizenship and denial of admission to the United States in the future.

This document states the complete and only Plea Agreement between the United States of America and the Defendant, and is binding only on the parties to this Agreement, and it supersedes all prior understandings, if any, whether written or oral, and cannot be modified other than in writing and signed by all parties or on the record in Court. No other promises or inducements have been or will be made to the Defendant in connection with this case, nor have any promises or threats been made in connection with this plea.

ACKNOWLEDGMENTS:

I have read this agreement and carefully reviewed every part of it with my attorney. If I have difficulty understanding the English language, I have had a person fluent in the Spanish language interpret this agreement to me.

Date: 1-31-18 Defendant: Cynthia Rodriguez

I am the Defendant's counsel. I have carefully reviewed every part of this agreement with the Defendant. I certify that this agreement has been translated to my client by a person fluent in the Spanish language if my client is unable to read or has difficulty understanding the English

language.

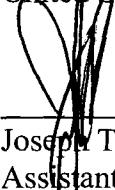
Date: 1/31/18



Counsel for Defense

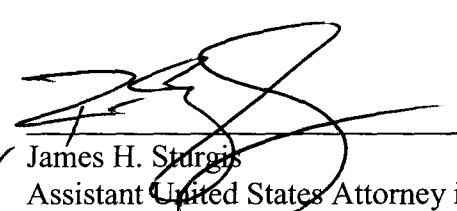
For the United States of America:

RYAN K. PATRICK
United States Attorney



Joseph T. Leonard
Assistant United States Attorney

APPROVED BY:


for James H. Sturgis
Assistant United States Attorney in Charge